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June 19, 2020

Via ECF Only

Honorable Gregory H. Woods, U.S.D.J.
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: United States v. Edward Shin
Case No.: 1:19-cr-00552-GHW

Dear Judge Woods:

I represent Edward Shin in the above-referenced matter. I am responding to the Court's Order dated June 10, 2020 regarding whether Mr. Shin and I would consent to the pretrial motions hearing scheduled for July 31, 2020 proceeding via Skype video-conference.

After much consideration and thought, my client and I are declining to proceed in this fashion at this time. The motion to suppress and the motion for a bill of particulars are substantive motions and I am uncomfortable arguing such important motions remotely. We understand that these are unusual times and I want to assure the Court that we are continuing to work on this case, including the preparation and filing of the pretrial motions and memorandum, review of discovery and other pretrial tasks.

Respectfully submitted,

/s/ Paul B. Brickfield

Paul B. Brickfield

cc: Robert Basil, Esq. (via ECF only)
Assistant U.S. Attorney Daniel Tracer (via ECF only)
Assistant U.S. Attorney Tara LaMorte (via ECF only)
Edward Shin (via electronic mail only)